Case 5:05-cr-00812-RMW Document 51 Filed 11/15/06 Page 1 of 3

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1	Federal Public Defender
2	JAY RORTY Assistant Federal Public Defender FILED
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4	Telephone: (408) 291-7753 NOV 1 5 206
5	Counsel for Defendant ZHANG CLERK U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE
6	5.11, 0.00 <u>C</u>
7	IN THE UNITED STATES DISTRICT COURT
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA
9	
10	UNITED STATES OF AMERICA,) No. CR-05-00812 RMW (HRL)
11	Plaintiff, STIPULATION AND (PROPOSED)
12	vs. ORDER FOR TRAVEL
13	SUIBIN ZHANG,) Honorable Howard R. Lloyd United States Magistrate-Judge
14	Defendant.
15	Defendent SUIDIN 7HANG and the United States through their respective counsel
16	Defendant SUIBIN ZHANG and the United States through their respective counsel,
17	Assistant Federal Public Defender Jay Rorty and Assistant United States Attorney David
18	Callaway, hereby request that, subject to the Court's approval, the conditions of release
19	previously set by the Court on December 22, 2005, may be modified to permit defendant, Suibin
20	Zhang, to travel to the Lake Tahoe area to spend Thanksgiving with his family. Mr. Zhang will
21	be traveling with his wife, son and parents leaving home on Wednesday, November 23, 2006 and
22	returning on Saturday, November 25, 2006. While at Lake Tahoe the Zhang family will be
23	staying at Squaw Valley Lodge located at 201 Squaw Peak Rd., Olympic Valley, CA 96146,
24	telephone number 1(800) 549-6742.
25	
26	
	Stipulation and (Proposed) Order for Travel

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đ	ase 5:05-cr-00812-RMW Document 50-1 Filed 11/14/2006 Page 2 of 3
1	November 14, 2006 /S/ <u>JAY RORTY</u>
2	Assistant Federal Public Defender
3	
4	November 14, 2006 /S DAVID CALLAWAY
5	Assistant United States Attorney
6	
7	
8	ORDER
9	GOOD CAUSE APPEARING,
10	IT IS ORDERED that the conditions of release set on December 22, 2005 are hereby
11	modified to permit defendant, Suibin Zhang, to permit defendant, Suibin Zhang, to travel with
12	his family for Thanksgiving. Mr. Zhang will be traveling with his wife, son and parents leaving
13	home on Wednesday, November 23, 2006 and returning on Saturday, November 25, 2006.
14	While at Lake Tahoe the Zhang family will be staying at Squaw Valley Lodge located at 201
15	Squaw Peak Rd., Olympic Valley, CA 96146, telephone number 1(800) 549-6742.
16	IT IS FURTHER ORDERED that all other conditions of release shall remain in full force
17	and effect.
18	
19	Dated: November 15, 2006 HOWARD R. LLOYD RICHARD SEESURG
20	United States Magistrate-Judge
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	Stipulation and (Proposed) Order for Travel 2

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1	Distribute to:
2	Jay Rorty Assistant Federal Public Defender
3	160 West Santa Clara Street, Suite 575 San Jose, CA 95113
4	Counsel for Defendant
5	David Callaway Assistant United States Attorney
6 150 Almaden Blvd., Suite 900 San Jose, CA 95113	San Jose, CA 95113
7	Counsel for the United States
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